

# EXHIBIT 39

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39 Desc: Main  
Document Page 1 of 6

RECEIVED & FILED  
2021 OCT 22 PM 5:09  
CLERK OF COURT  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

October 14, 2021

TO: Commonwealth of PR Supplemental Information Processing Center  
c/o Prime Clerk, LLC 850 Third Avenue Suite 412  
Brooklyn NY 11232

(United States District Court)

Room 150 Federal Building  
San Juan PR 00918-1767

Puerto Rico Ballot Processing  
c/o Prime Clerk LLC  
One Grand Central Place  
60 East 42<sup>nd</sup> Street, Suite 1440  
New York, NY 10165

RE: Claim No. 49762/Procedimiento 17 BK3283 -LTS

On September 2020 I sent the included documents (copy) and I was living on the following address:

Urb. Santa Elena, JJ33 Calle H, Bayamón, PR 00957

I hereby request that all documents to be sent to me regarding the reference claim, be sent to the following address, since I moved from such address:

**NEW MAILING ADDRESS:**

Urb BELLA VISTA  
CALLE 8 J31  
BAYAMON PR 00957

Please send any new correspondence to de new mailing address.

Cordially,



Hilda L. Cruz Román  
Ce. 787-615-2525  
Email: lourdespr2009@gmail.com

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39 Desc: Main  
Document Page 2 of 6

Proof of Claim: <CLAIM NUMBER>

49762

Claimant: <CLAIMANT NAME>

Isilda L. Cruz Roman

INFORMATION REQUESTED TO PROCESS YOUR CLAIM

Instructions

Please answer all four (4) questions and any applicable sub-questions. Please include as much detail as possible in your responses. Your answers should provide more information than the initial proof of claim. For example, if you previously wrote as the basis for your claim "Ley 96," please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim. Additionally, if available and applicable to your claim, please provide:

- Copy of a pleading, such as Complaint or an Answer;
- Any unpaid judgment or settlement agreement;
- Written notice of intent to file a claim with proof of mailing;
- Any and all documentation you believe supports your claim.

Please send the completed form and any supporting documents via email to [PRClaimsInfo@primedclerk.com](mailto:PRClaimsInfo@primedclerk.com), or by mail or hand delivery to the following address:

Commonwealth of Puerto Rico Supplemental Information Processing Center  
c/o Prime Clerk, LLC  
850 Third Avenue, Suite 412  
Brooklyn, NY 11232

Questionnaire

1. What is the basis of your claim?

A pending or closed legal actions with or against the Puerto Rico government

■ Current or former employment with the Government of Puerto Rico

Other (Provide as much detail as possible below. Attach additional pages if needed.)

Government agency until 1999

2. What is the amount of your claim (how much money do you claim to be owed):

\$ 8,900

3. Employment. Does your claim relate to current or former employment with the Government of Puerto Rico?

☐ No, Please continue to Question 4.

☒ Yes, Answer Questions 3(a) – (d).

3(a). Identify the specific agency or department where you were or are employed:

Puerto Rico Telephone Company

3(b). Identify the dates of your employment related to your claim:

Began working on May 4, 1998  
until sale of the company belonging  
to the government or  
later I continued working as a private  
company to date.

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39  
Desc: Main Document Page 3 of 6

#### IV. Supporting Documentation

Documents are included evidencing my years of service with the Puerto Rico Telephone Company, Ponce, Puerto Rico, from May 04, 1992, through the present. I ended my work until 1999, working for PRTC, then [illegible] and now Claro. Never left the company. in the Puerto Rico Telephone Company, Ponce, Puerto Rico, Commonwealth. The claim is being filed under the applicable laws that cover these years of service.

Documents in support of this claim are enclosed.

Due to the recent emergency situation with earthquakes and COVID-19 in Puerto Rico, the replies are being sent on this date. Should you need additional information or documents, please contact the undersigned.

Hilda L. Cruz Roman

Printed name

[Signature]

Signature

- *Managerial employee from May 04, 1992, until 1999.*
- *At present still an employee of the company*

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39 Desc: Main  
Document Page 4 of 6

## REPLY TO OMNIBUS OBJECTION

### I. CONTACT DETAILS

Name: Hilda L. Cruz Román  
Postal Address: Urb. Santa Elena  
JJ 33 Calle #  
Bayamón, PR 00957

Contact Telephone home \_\_\_\_\_ cellphone 787-615-2525

### II. Caption

- A. Clerk's Office  
United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico 00918-1767
- B. Commonwealth of Puerto Rico, et al. (Debtors)
- C. Docket Number: 17 BK 3283-LTS
- D. Omnibus Objection relating to the request for money not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

#49762 – Act #89 – Romerazo – Effective July 01, 1995

#94057 – Salary Scale Act – Steps, dated June 06, 2008

#96621 – Act #96 (2002) of Dr. Pedro Rosello – effective July 2002  
Act #164 (2004) of Mrs. Sila Calderón – effective January 2004

### III. The Court must not grant the omnibus objection since the money is owed under the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 – Romerazo – Effective July 01, 1995

Salary Scale Act – Levels, of June 06, 2008

Act #96 (2002) of Dr. Pedro Rosello – effective July 2002

Act #164 (2004) of Mrs. Sila M. Calderón – effective January 2004

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39 Desc: Main Document Page 5 of 6

3(d). What is the nature of your employment claims (select all applicable):

☐ Pension

☒ Unpaid Wages

☐ Sick Days

☐ Union Grievance

☐ Vacation

☐ Other (Provide as much detail as possible. Attach additional pages if necessary).

4. Legal Action Does your claim relate to a pending or closed legal action?

☒ No

☐ Yes

4(a). Identify the department or agency that is a party to the action.

United States District Court

4(b). Identify the name and address of the court or agency where the action is pending:

4(c). Case number:

49762

4(d). Title, Caption, or Name of Case:

Honora W

4(e). Status of the case (pending, on appeal, or concluded):

pending

4(f). Do you have an unpaid judgment? Yes/No (Circle one)

No

If yes, what is the date and amount of the judgment?

Case:17-03283-LTS Doc#:19344 Filed:11/22/21 Entered:11/23/21 10:35:39 Desc: Main  
Document Page 6 of 6

CLAIMANT: Hilda L. Cruz Román

DOCKET NUMBER: 17 BK 3283-LTS

CLAIM NUMBER: 49762

Claim of money owed from under laws that apply to me for my years of service from May 5, 1992, until \_\_\_\_\_, 1999, as a PRTC managerial employee those years at the Puerto Rico Telephone Company – Commonwealth. I then continued working there until present.

1. Act 89 – July 1995 – ROMERAZO                      AMOUNT: \$8400

As well as other laws that apply to me and the corresponding compensation has not been granted to me.

I thank you for your attention on this matter.

Yours sincerely,

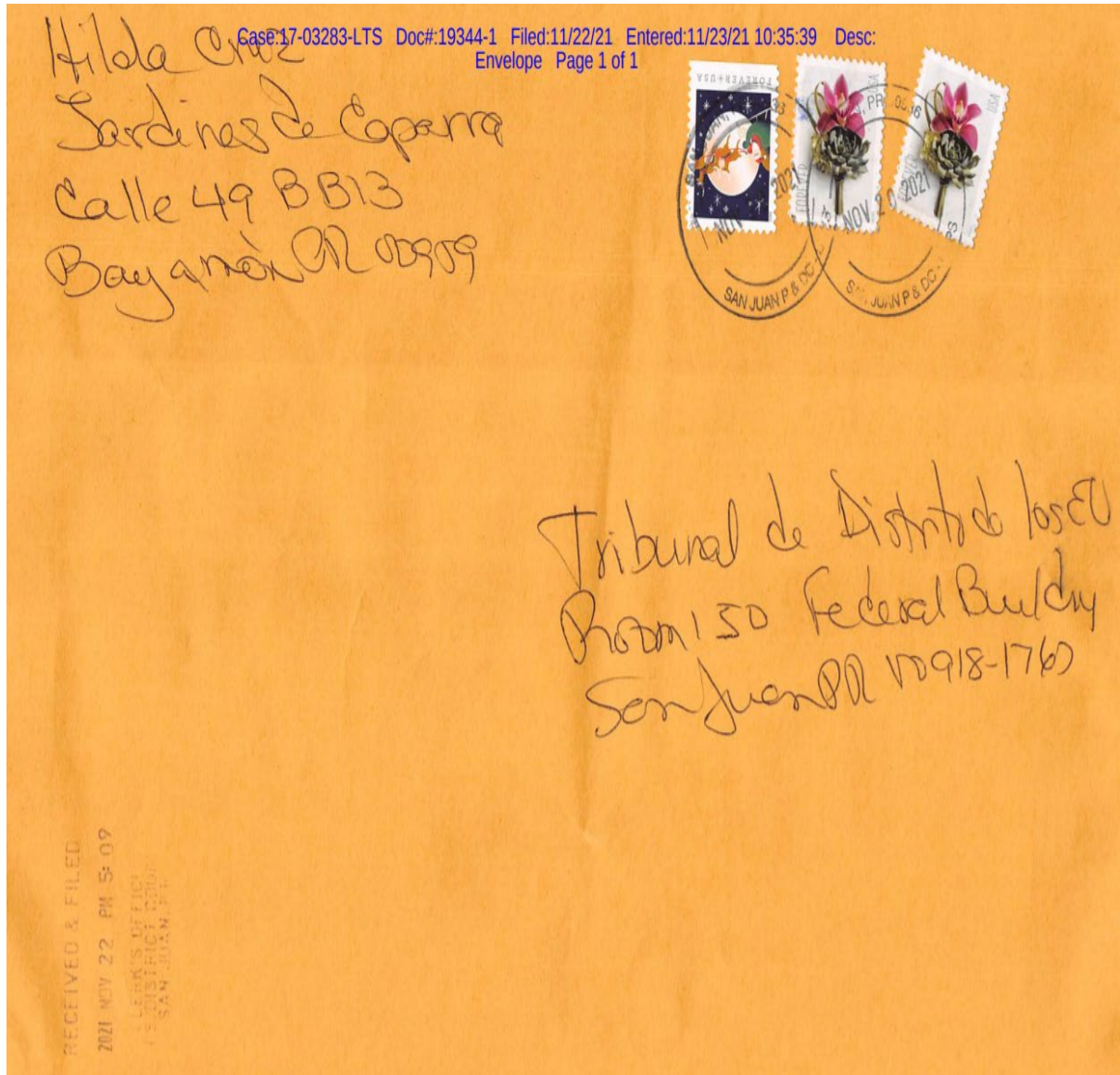
Hilda L. Cruz Roman

Name in Print

[Signature] 09/01/2020

Signature and date









**T** 718.384.8040  
**W** TargemTranslations.com  
**E** projects@targemtranslations.com  
**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 176520 ECF No 19344**

Signed this 29<sup>th</sup> day of December, 2021



A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

